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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 **-Oo-**

9 UNITED STATES OF AMERICA,)
10 Plaintiff,) 2:12-cr-0058-PMP
11 vs.) **MOTION FOR JOINDER OF**
12) **PLAINTIFFS MOTION**
13) **FOR REDUCTION OF DEFENDANT'S**
14) **SENTENCE AND SUPPLEMENT THERETO**
15 MANDIE L. ABELS,)
16 Defendant.)

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19 COMES NOW, Chad A. Bowers, Esq, counsel of record for Defendant Mandie
Abels, in the above entitled matter and hereby respectfully requests that this Court grant
Plaintiff's Motion for Reduction of Defendant Mandie Abels' Sentence under Federal Rule
of Criminal Procedure 35 (Docket #24) and requests that Ms. Abel's sentence be reduced
by 5 years to ten years (120 Months) in prison as recommended by the Government in the
supplement thereto (Docket #27).

20 Dated this 14th day of December, 2014.
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23 /S
Chad A. Bowers, Esq.
24 Attorney for Defendant
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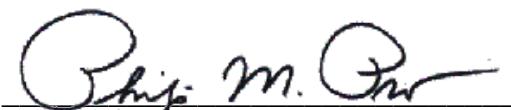
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3 **MEMORANDUM IN SUPPORT OF MOTION FOR JOINDER**

4 Defendant Abels in complete agreement with the Government's position as stated
5 in the pleadings relating to the Government's motion. Defendant will file a sentencing
6 memorandum under separate cover further detailing the various reasons why a five year
7 reduction in Ms. Abels sentence is fair and appropriate. For purposes of this motion for
8 Joinder Defendant believes that the Government's motion accurately and sufficiently lays
9 out the legal and factual basis for a reduction in Ms. Abels' sentence. Under separate cover
10 Ms. Abels will address various aspects of her conduct prior and subsequent to the offense
11 as well as provide letters of support and other materials supporting the appropriateness of
12 a 120 month sentence.

13 Dated this 14th day of December, 2014.

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15 _____/s_____
16 Chad A. Bowers, Esq.
17 Attorney for Defendant Abels
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20 IT IS SO ORDERED:

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22 PHILIP M. PRO, U.S. District Judge

23 Dated: December 15, 2014

1 CERTIFICATE OF SERVICE
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3 The undersigned certifies that the foregoing Motion for Joinder was electronically
4 filed in compliance with local rule to provide a true and accurate electronic copy to all
5 interested parties in this action.

6 Dated this 14th day of December, 2014.

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8 _____/s_____

9 Chad A. Bowers, Esq.
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